

EXHIBIT 61

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF ZELIG STAHL

I, Zelig Stahl, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Diego International Airport as a Fleet Service Agent, and have held that position with US Airways or one of its corporate predecessors since 2008. I previously worked at the Skyharbor International Airport in Phoenix, Arizona.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek or more than eight hours in a day as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I work part-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to this process I am typically scheduled to work 5 days per week and about

DECLARATION OF ZELIG STAHL

1 4 hours per shift by US Airways. Occasionally, I voluntarily shift trade or shift swap with other
2 Fleet Service Agents. This means that either another Agent works one of the shifts US Airways
3 scheduled me to work or that I work a shift that US Airways scheduled another agent to work. As
4 a result, I may have worked more or less hours in a week than I was originally scheduled to work
5 by US Airways.

6 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
7 agreement between US Airways and my union. I am aware that the collective bargaining
8 agreement contains provisions governing shift trades, including restrictions on how far in advance
9 shift trades must be submitted and that hours worked as a result of voluntary shift trades will be
10 paid at my regular rate of pay.

11 6. In the experience, managers are generally not involved in approving shift trades.
12 Rather, shift trades are done through an electronic system called "Workbrain." Agents log-in to
13 Workbrain using a unique user name and password and either post shifts that they would like to
14 drop or sign-up to take shifts that others have indicated they wish to drop.

15 7. I understand that when I trade shifts with a fellow employee using the Workbrain
16 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
17 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
18 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
19 trade.

20 8. I have never been forced or pressured by US Airways in any way to work a shift
21 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
22 to work more or less shifts than originally scheduled.

23 9. Being able to trade shifts with Fleet Service Agents is one of the most important
24 privileges of working at US Airways. Shift-trades allow me greater flexibility to make my own
25 schedule. I use shift-trades to drop shift so that I can spend time with family or to travel and take
26 advantage of the travel privileges that are afforded to me by US Airways. For example, I recently
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1 used shift-trades to take an extended vacation in Phoenix, Arizona. If US Airways stopped
2 allowing employees to trade shifts, I would have far less flexibility in my schedule and it would
3 be much more difficult for me to balance my life. I do not support a lawsuit that challenges the
4 shift-trade policy.

5 10. In my experience shift-trades are extremely popular among Fleet Service Agents.
6 Many agents use trades to balance other employment or to create a flexible schedule for other,
7 personal reasons, such as taking extended vacations or spending more time with family. In
8 addition, many part-time Fleet Service Agents rely on shift-trades to earn additional income by
9 picking up additional shifts.

10 11. Throughout my employment with US Airways, I have been provided a wage
11 statement on a biweekly basis.

12 12. On each wage statement, I understand the way my pay is calculated. On a few
13 occasions while I was working in Phoenix, Arizona, I noticed a discrepancy on my wage
14 statement. In those instances, I spoke with administration and they promptly corrected the
15 discrepancy. As a result, I believe that I have been paid accurately for all hours worked.

16 13. If I noticed any errors on my wage statement while working at the San Diego
17 International Airport, I would discuss these with administration to correct the error.

18 14. On occasion, I have worked overtime hours at US Airways' request, for example,
19 due to a flight delay that extended my scheduled shift. When I worked more than 8 hours a day
20 or 40 hours in a week, all at US Airways' request, I was paid at the rate of time and a half for all
21 such hours worked.

22 15. To the best of my knowledge, I have not incurred any work-related expenses
23 during my employment as a Fleet Service Agent at US Airways.

24 16. I have never been forced or pressured in any way by US Airways to use my
25 personal cellular phone for work-related purposes while on the clock.

Zelig Stahl
ZELIG STAHL

EXHIBIT 62

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF HUBERT PATRICK STEWART

I, Hubert Patrick Stewart, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I have been employed by US Airways, Inc. ("US Airways") or one of its corporate predecessors since 1970. I am currently employed by US Airways at San Diego International Airport as a Fleet Service Agent and have worked as a Fleet Service Agent for approximately thirty (30) of my forty three (43) years of employment with US Airways. For approximately thirteen (13) years of my employment with US Airways, I worked as a Reservation Service Agent or as a Customer Service Agent. I began my employment with US Airways at Los Angeles International Airport, in Los Angeles, California, but have worked at the San Diego International Airport since approximately 1976.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek or 8 hours in a day as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and

DECLARATION OF HUBERT PATRICK STEWART

1 pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft,
2 positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I
3 work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I
4 bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8
5 hours per shift by US Airways. Occasionally, I voluntarily shift trade or shift swap with other
6 Fleet Service Agents. This means that either another Agent works one of the shifts US Airways
7 scheduled me to work or that I work a shift that US Airways scheduled another agent to work. As
8 a result, I may have worked more or less hours in a week than I was originally scheduled to work
9 by US Airways.

10 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
11 agreement between US Airways and my union. I am aware that the collective bargaining
12 agreement contains provisions governing shift trades, including the number of shifts that Fleet
13 Service Agents may drop per calendar quarter and that hours worked as a result of voluntary shift
14 trades will be paid at my regular rate of pay.

15 6. In my experience, Managers are not involved in approving shift trades. Rather,
16 shift trades are effected through an electronic system called "Workbrain." Agents log-in to
17 Workbrain using a unique user name and password and either post shifts that they would like to
18 drop or sign-up to take shifts that others have indicated they wish to drop.

19 7. I understand that when I trade shifts with a fellow employee using the Workbrain
20 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
21 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
22 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
23 trade.

24 8. I have never been forced or pressured by US Airways in any way to work a shift
25 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
26 to work more or less shifts than originally scheduled.

1 9. Being able to trade shifts with Fleet Service Agents is one of the greatest benefits
2 of working at US Airways. As an example of how it is such a benefit, several times per year, I
3 use shift-trades to drop an entire week of my regularly scheduled shifts at a time in combination
4 with taking one week of my vacation time. This allows me to extend my vacations by an
5 additional week. As a result, I often take four two-week vacations per year, even though I am
6 only entitled to four weeks of vacation per year. I also use shift trades to drop shifts in order to
7 spend time with family members when they visit San Diego. In sum, shift-trades allow me
8 greater flexibility to make my own schedule, but, overall, I do not work substantially more hours
9 because of shift-trades. If US Airways stopped allowing employees to trade shifts, I would be
10 very upset. I would consider retiring earlier than I currently plan to, because I would lose the
11 control that I currently have over my schedule. I am not aware of any other job that has so much
12 flexibility. I do not support a lawsuit that challenges the shift-trade policy.

13 10. In my experience shift-trades are extremely popular among Fleet Service Agents.
14 Many agents use trades to balance other employment or to create a flexible schedule for other,
15 personal reasons, such as taking extended vacations or spending more time with family.
16 Importantly, many part-time Fleet Service Agents use the shift-trade policy to earn additional
17 income that otherwise would not be available to them by picking up additional shifts. If the shift-
18 trade policy were eliminated, I believe that morale amongst the Fleet Service Agents at the San
19 Diego International Airport would be severely affected.

20 11. Throughout my employment with US Airways, I have been provided a wage
21 statement on a biweekly basis.

22 12. On each wage statement, I understand the way my pay is calculated. In addition to
23 regularly reviewing my wage statement, I sometimes review my hours worked as recorded on
24 Workbrain. Over the years, on a few rare occasions, I have noticed a discrepancy on my wage
25 statement. In those instances, I have spoken to the appropriate Station personnel and the
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1 discrepancy has been promptly corrected. As a result, I believe I have been paid accurately for all
2 hours worked.

3 13. If I noticed any errors on my wage statement in the future, I would discuss these
4 with Lynn Silva, the Station Manager at San Diego International Airport.

5 14. On occasion, I have worked overtime hours at US Airways' request, for example,
6 due to a flight delay that extended my scheduled shift. When I worked more than 8 hours a day
7 or 40 hours in a week, all at US Airways' request, I was paid at the rate of time and a half for all
8 such hours worked.

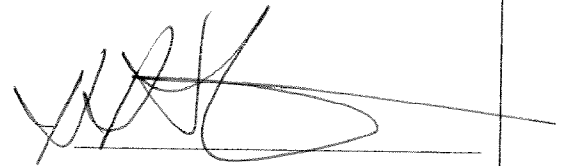
9 15. On occasion, I have incurred work-related expenses during my employment as a
10 Fleet Service Agent at US Airways. For example, recently we had a company barbeque, but the
11 barbeque was out of propane. As a result, I used my personal funds to purchase the propane.
12 Afterwards, I spoke with Lynn Silva, the Station Manager at San Diego International Airport, and
13 was promptly reimbursed for the expense.

14 16. I have never been forced or pressured in any way by US Airways to use my
15 personal cellular phone for work-related purposes while on the clock. It is difficult to exceed the
16 minutes allowed by my personal cellular phone plan, and I cannot recall an occasion when I have
17 exceeded the minutes allowed under my plan.

18
19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21 EXECUTED this 26th day of September, 2013 at San Diego County.
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HUBERT PATRICK STEWART

EXHIBIT 63

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF WILLIAM SWARTWOOD

I, William Swartwood, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at Sacramento International Airport as a Fleet Service Agent, and have held that position with US Airways or one of its corporate predecessors since 1994. I previously worked at San Francisco International Airport from approximately 1990-1994 as a Fleet Service Agent, and have held that position with US Airways or its corporate predecessors.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I

DECLARATION OF WILLIAM SWARTWOOD

1 bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8
2 hours per shift by US Airways. Almost every week, I voluntarily shift trade or shift swap with
3 other Fleet Service Agents. This means that either another Agent works one of the shifts US
4 Airways scheduled me to work or that I work a shift that US Airways scheduled another agent to
5 work. As a result, I may have worked more or less hours in a week than I was originally
6 scheduled to work by US Airways.

7 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
8 agreement between US Airways and my union. I am aware that the collective bargaining
9 agreement contains provisions governing shift trades, including restrictions on how far in advance
10 shift trades must be submitted and that hours worked as a result of voluntary shift trades will be
11 paid at my regular rate of pay.

12 6. In my experience, managers are not involved in approving shift trades. Rather,
13 shift trades are effected through an electronic system called "Workbrain." Agents log-in to
14 Workbrain using a unique user name and password and either post shifts that they would like to
15 drop or sign-up to take shifts that others have indicated they wish to drop.

16 7. I understand that when I trade shifts with a fellow employee using the Workbrain
17 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
18 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
19 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
20 trade.

21 8. I have never been forced or pressured by US Airways in any way to work a shift
22 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
23 to work more or less shifts than originally scheduled.

24 9. I like being able to trade shifts with Fleet Service Agents. In fact, the flexibility
25 afforded by being able to trade shifts is extremely important to me. Trading shifts allows me to
26 arrange my schedule in order to take care of my children, who I pick up from school daily while
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1 my wife is still at work, to tend to family emergencies, and to take time off to travel with my
2 family using the travel privileges provided to me by US Airways. Shift-trades allow me greater
3 flexibility to make my own schedule, but, overall, I do not work substantially more hours because
4 of shift-trades. In fact, I usually use the shift-trade policy to drop one or more of my regularly
5 scheduled shifts. If US Airways stopped allowing employees to trade shifts, I would be very
6 upset. I would have far less flexibility in my schedule and this would make it much more difficult
7 for me to care for my children and to maximize the time I spend with my family. The shift trades
8 are a very important aspect of my job at US Airways. I would probably have to leave my job as a
9 Fleet Service Agent if I could no longer trade shifts because I would no longer be able to arrange
10 my scheduled as needed to care for my children. I do not support a lawsuit that challenges the
11 shift-trade policy.

12 10. In my experience shift-trades are extremely popular among Fleet Service Agents.
13 Many agents use trades to create a flexible schedule for other, personal reasons, to travel using
14 the flight privileges afforded to them by US Airways, to shorten their workweek or for family or
15 personal reasons. I believe that if US Airways stopped allowing shift-trades that many Fleet
16 Service Agents would be upset by the loss of flexibility this job affords.

17 11. Throughout my employment with US Airways, I have been provided a wage
18 statement on a biweekly basis.

19 12. On each wage statement, I understand the way my pay is calculated. I believe that
20 the information on my wage statements is an accurate reflection of the number of hours I worked.
21 I have not noticed any discrepancies or errors on my wage statements.

22 13. If I noticed any errors on my wage statement, I would discuss these with Barbara
23 Clark, the Workbrain Timekeeper at Sacramento International Airport.

24 14. On occasion, I have worked overtime hours at US Airways' request, for example,
25 due to a flight delay, to cover charter flights, or to cover if another Fleet Service Agent calls in
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1 sick. When I worked more than 8 hours a day or 40 hours in a week, all at US Airways' request, I
2 was paid at the rate of time and a half for all such hours worked.

3 15. I have not incurred any work-related expenses during my employment as a Fleet
4 Service Agent at US Airways. If I did, I would not hesitate to submit an expense report to request
5 a reimbursement.

6 16. I have never been forced or pressured in any way by US Airways to use my
7 personal cellular phone for work-related purposes while on the clock. There are company phones
8 throughout my work area, which I can use as needed. Moreover, US Airways prohibits use of
9 cellular phones on the ramp.

10 17. I have an unlimited cell phone plan and it is therefore difficult, if not impossible,
11 to exceed the minutes allowed by my personal cellular phone plan, and I cannot recall an occasion
12 when I have exceeded the minutes allowed under my plan.

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14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

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18 **EXECUTED** this 19 day of September at Sacramento County.

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22 WILLIAM SWARTWOOD

EXHIBIT 64

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF JOSE PINEDA TABOADA

I, Jose Pineda Taboada, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Diego International Airport as a Lead Fleet Service Agent, and have held that position with US Airways or one of its corporate predecessors since approximately 2008. Prior to that, I worked as a Fleet Service Agent for US Airways or one of its corporate predecessors at San Diego International Airport beginning in 2004.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek or more than eight hours in a day as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Lead Fleet Service Agent, I am responsible for training and overseeing teams of Fleet Service Agents and for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an

DECLARATION OF JOSE PINEDA TABOADA

1 hourly basis. US Airways establishes a weekly schedule that I bid for and I typically bid and
2 obtain a morning shift schedule. About three times a week, I voluntarily shift trade or shift swap
3 with other Lead or Lead-qualified Fleet Service Agents or Lead-qualified Fleet Service Agents.
4 This means that either another Agent works one of the shifts US Airways scheduled me to work
5 or that I work a shift that US Airways scheduled another agent to work. As a result, I may have
6 worked more or less hours in a week than I was originally scheduled to work by US Airways.

7 5. As a Lead Fleet Service Agent, my employment is governed by a collective
8 bargaining agreement between US Airways and my union. Though I am not very familiar with
9 the provisions of the collective bargaining agreement, I am aware of the rule that hours worked as
10 a result of voluntary shift trades will be paid at my regular rate of pay.

11 6. Based on my experience, managers are generally not involved in approving shift
12 trades. Rather, shift trades are done through an electronic system called "Workbrain." Agents
13 log-in to Workbrain using a unique user name and password and either post shifts that they would
14 like to drop or sign-up to take shifts that others have indicated they wish to drop.

15 7. I understand that when I trade shifts with a fellow employee using the Workbrain
16 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
17 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
18 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
19 trade.

20 8. I have never been forced or pressured by US Airways in any way to work a shift
21 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
22 to work more or less shifts than originally scheduled.

23 9. Being able to trade shifts with Lead Fleet Service Agents is extremely important to
24 me. I use shift trades to coordinate my schedule at my job with US Airways with my schedule at
25 my second job for a local school district, where I work as a Paraprofessional with special needs
26 students. Because my regularly-scheduled shifts at US Airways are in the morning, I drop these
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1 shifts several times per week so that I can work my other job as a Paraprofessional. To make up
2 these hours, I will use shift trades to pick-up shifts in the evening during the week. In addition,
3 shift-trades allow me greater flexibility to drop some of my regularly scheduled shifts so that I
4 can spend time with my family and travel all over the world to places like Italy and Spain, where
5 I vacationed this past summer. Overall, I do not work substantially more hours because of shift-
6 trades. If US Airways stopped allowing employees to trade shifts, I would be very upset, because
7 I would have far less flexibility in my schedule. I would have to bid for an evening shift schedule
8 in order to accommodate my job as a Paraprofessional, which, because of my seniority level at
9 US Airways, would require me to work evening shifts on the weekends. Weekend evenings are
10 among the few times I have available during the week to spend with my family, and this time
11 together is very important to me. I do not support a lawsuit that challenges the shift-trade policy.

12 10. In my experience shift-trades are very popular among Fleet Service Agents. Many
13 agents use trades to balance other employment or to create a flexible schedule for other, personal
14 reasons, such as taking extended vacations or spending more time with family. In my experience,
15 Fleet Service Agents particularly enjoy the shift trade policy, because it allows them to take
16 advantage of the travel privileges that are afforded to us by US Airways. If US Airways stopped
17 allowing employees to trade shifts, I think that many Fleet Service Agents would be very upset.

18 11. Throughout my employment with US Airways, I have been provided a wage
19 statement on a biweekly basis. On each wage statement, I understand the way my pay is
20 calculated. In addition, I am able to review my hours worked as recorded on Workbrain, which I
21 do regularly.

22 12. A couple of times, I noticed on Workbrain that I forgot to clock-in when I began
23 work which resulted in a discrepancy in the number of hours that I worked and my hours as
24 recorded in Workbrain. In those instances, I completed and submitted an exception report and this
25 error was promptly corrected. As a result, I believe that the information on my wage statements
26 is an accurate reflection of the number of hours I have worked.

14. I have never been forced or pressured in any way by US Airways to use my personal cellular phone for work-related purposes while on the clock, nor have I incurred any work-related expenses during my employment as a Fleet Service Agent at US Airways.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED this 26 day of September, 2013 at San Diego County.


JOSE PINEDA TABOADA

EXHIBIT 65

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF RICKY TOWNSENE

I, Ricky Townsened, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Francisco International Airport as a full-time Lead Fleet Service Agent and have held that position with US Airways since 2011. I held the position of Fleet Service Agent with US Airways or its corporate predecessors from 1986 to 2011. From 1986-1987, I worked out of Pasco Airport, in Washington. From 1989-2011, I worked as a Fleet Service Agent part-time.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Lead Fleet Service Agent, I am responsible for training and overseeing teams of Fleet Service Agents, scanning and moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, break-riding aircraft while being towed, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs

DECLARATION OF RICKY TOWNSENE

USAIR0001156

1 towing baggage carts. I am paid on an hourly basis. US Airways establishes a weekly schedule
2 that I bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8
3 hours per shift by US Airways. On occasion, I voluntarily shift trade or shift swap with other
4 Fleet Service Agents. This means that either another Agent works one of the shifts US Airways
5 scheduled me to work or that I work a shift that US Airways scheduled another agent to work. As
6 a result, I may have worked more or less hours in a week than I was originally scheduled to work
7 by US Airways.

8 5. Managers are not involved in approving shift trades. Rather, shift trades are
9 effected through an electronic system called "Workbrain." Agents log-in to Workbrain using a
10 unique user name and password and either post shifts that they would like to drop or sign-up to
11 take shifts that others have indicated they wish to drop.

12 6. I understand that when I trade shifts with a fellow employee using the Workbrain
13 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
14 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
15 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
16 trade.

17 7. As a Fleet Service Agent, my employment is governed by a collective bargaining
18 agreement between US Airways and my union. I am aware that the collective bargaining
19 agreement contains provisions governing shift trades, including hours worked as a result of
20 voluntary shift trades will be paid at my regular rate of pay and the number of regularly scheduled
21 shifts that can be dropped through shift trades per calendar quarter.

22 8. I have never been forced or pressured by US Airways in any way to work a shift
23 under the general shift-trade policies. It is entirely up to me whether I use the shift-trade process
24 to work more or less shifts than originally scheduled.

25 9. I like being able to trade shifts with Fleet Service Agents. Trading shifts allows
26 me to take more time off for vacations and to spend with my family. Previously, when I worked
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1 as Fleet Service Agent, shift trades allowed me to regularly drop shifts, which in turn allowed me
2 to balance other employment, including my own business. Shift-trades allow me greater
3 flexibility to make my own schedule, but, overall, I do not work substantially more hours because
4 of shift-trades. If US Airways stopped allowing employees to trade shifts, I would be very
5 disappointed as this would greatly restrict my ability to make my own schedule, which is very
6 important to me. I do not support a lawsuit that challenges the shift-trade policy.

7 10. In my experience shift-trades extremely popular among Fleet Service Agents.
8 Many agents use trades to balance other employment or to create a flexible schedule for other,
9 personal reasons, such as visiting family, traveling abroad, scheduling extended vacations, and
10 caring for family members.

11 11. On occasion, I have worked overtime hours at US Airways' request, for example,
12 due to a flight delay that extended my scheduled shift, or to cover the regularly scheduled shift of
13 another agent out sick or on vacation. When I worked more than 8 hours a day or 40 hours in a
14 week, all at US Airways' request, I was paid at the rate of time and a half for all such hours
15 worked.

16 12. I have not incurred any work-related expenses during my employment as a Fleet
17 Service Agent at US Airways.

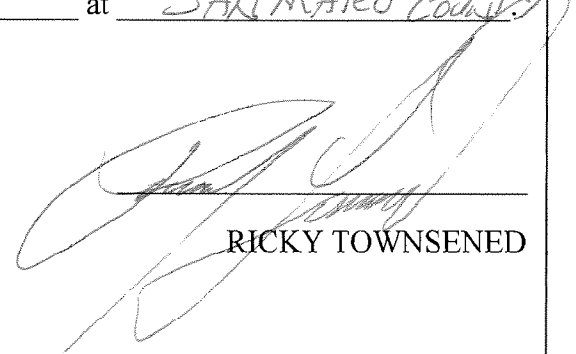
18 13. I have never been forced or pressured in any way by US Airways to use my
19 personal cellular phone for work-related purposes while on the clock.

20 14. It is difficult to exceed the minutes allowed by my personal cellular phone plan,
21 and I cannot recall an occasion when I have exceeded the minutes allowed under my plan.

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23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

1 EXECUTED this 8th day of AUGUST at SALMATED COUNTY

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RICKY TOWNSENE

EXHIBIT 66

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF HORATIO URIBE

I, Horatio Uribe, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Francisco International Airport as a Fleet Service Agent, and have held that position with US Airways or its corporate predecessors since 2004.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I currently work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8 hours per shift by US Airways. I previously worked part-time as a Fleet Service

DECLARATION OF HORATIO URIBE

1 Agent, paid on an hourly basis, and was typically scheduled to work 5 days per week and 6 hours
2 per shift by US Airways. Frequently, when I was part-time, I voluntarily shift traded or shift
3 swapped with other Fleet Service Agents. Now that I am full-time, I shift trade less often but still
4 shift trade on occasion. To "shift trade" means that either another Agent works one of the shifts
5 US Airways scheduled me to work or that I work a shift that US Airways scheduled another agent
6 to work. As a result, I may have worked more or less hours in a week than I was originally
7 scheduled to work by US Airways.

8 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
9 agreement between US Airways and my union. I am aware that the collective bargaining
10 agreement contains provisions governing shift trades, including restrictions on how far in advance
11 shift trades must be submitted and that hours worked as a result of voluntary shift trades will be
12 paid at my regular rate of pay.

13 6. Managers are not involved in approving shift trades. Rather, shift trades are
14 effected through an electronic system called "Workbrain." Agents log-in to Workbrain using a
15 unique user name and password and either post shifts that they would like to drop or sign-up to
16 take shifts that others have indicated they wish to drop.

17 7. I understand that when I trade shifts with a fellow employee using the Workbrain
18 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
19 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
20 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
21 trade.

22 8. I have never been forced or pressured by US Airways in any way to work a shift
23 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
24 to work more or less shifts than originally scheduled.

25 9. I like being able to trade shifts with Fleet Service Agents. Trading shifts allows
26 me to spend more time on personal pursuits, such as traveling and enjoying a day off. When I
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1 worked part-time, shift trades allowed me to earn additional money by voluntarily picking up
2 extra hours. Shift-trades allow me greater flexibility to make my own schedule, but, overall, now
3 that I work full-time, I do not work substantially more hours because of shift-trades. Being able
4 to take a day off here and there is important to me, and a very attractive aspect of my job. Shift
5 trades also allow me greater flexibility to travel using the flight privileges afforded to me by US
6 Airways, which is another attractive aspect of my employment as a US Airways Fleet Service
7 Agent. If US Airways stopped allowing employees to trade shifts, I would have far less
8 flexibility in my schedule and this would make it much more difficult for me to travel and to
9 schedule days off. I would be upset if shift-trades were eliminated. I do not support a lawsuit
10 that challenges the shift-trade policy.

11 10. In my experience shift-trades are very popular among Fleet Service Agents. Many
12 agents use trades to balance other employment or to create a flexible schedule for other, personal
13 reasons, such as to make additional income. I believe the Fleet Service Agents would be very
14 upset if shift trades were eliminated, and I believe it would be difficult for some Fleet Service
15 Agents to keep their jobs if shift trades were eliminated.

16 11. Throughout my employment with US Airways, I have been provided a wage
17 statement on a biweekly basis.

18 12. On each wage statement, I understand the way my pay is calculated. I believe that
19 the information on my wage statements is an accurate reflection of the number of hours I worked.
20 I have not noticed any discrepancies or errors on my wage statements.

21 13. If I noticed any errors on my wage statement, I would discuss these with Nathalie
22 Obregon, the Workbrain Timekeeper at San Francisco International Airport. I am able to review
23 the number of hours I have worked on Workbrain in advance of receiving my pay and I review
24 my hours regularly on Workbrain to ensure that my hours are accurately recorded.

25 14. On occasion, I have worked overtime hours at US Airways' request, for example,
26 due to added flights or other Fleet Service Agents' absence due to sickness or vacation. When I
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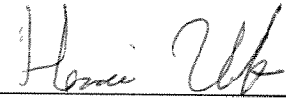
1 worked more than 8 hours a day or 40 hours in a week, all at US Airways' request, I was paid at
2 the rate of time and a half for all such hours worked.

3 15. I have not incurred any work-related expenses during my employment as a Fleet
4 Service Agent at US Airways.

5 16. It is difficult to exceed the minutes allowed by my personal cellular phone plan,
6 and I cannot recall an occasion when I have exceeded the minutes allowed under my plan.
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8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct.
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12 EXECUTED this 3 day of September at San Mateo County
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16 HORATIO URIBE
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EXHIBIT 67

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF ONEHUNGA VAIOMOUNGA

I, Onehunga Vaiomounga, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Jose International Airport as a Fleet Service Agent, and have held that position with US Airways or its corporate predecessors since 1999. I previously worked at Los Angeles International Airport as a Fleet Service Agent from 1999 - 2003 and at San Francisco International Airport from 2003 to 2005.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I

DECLARATION OF ONEHUNGA VAIOMOUNGA

1 greater flexibility to make my own schedule. If US Airways stopped allowing employees to trade
2 shifts, I would have far less flexibility in my schedule and this would make it much more difficult
3 for me to visit my family. I do not support a lawsuit that challenges the shift-trade policy.

4 10. In my experience shift-trades are extremely popular among Fleet Service Agents.
5 Many agents use trades to balance other employment or to create a flexible schedule for other,
6 personal reasons, such as taking extended vacations or spending more time with family.

7 11. Throughout my employment with US Airways, I have been provided a printed
8 wage statement on a biweekly basis.

9 12. On each wage statement, I understand the way my pay is calculated. I believe that
10 the information on my wage statements is an accurate reflection of the number of hours I worked.
11 I have not noticed any discrepancies or errors on my wage statements.

12 13. If I noticed any errors on my wage statement, I would discuss these with Tammy
13 Andersen, the Workbrain Timekeeper at San Jose International Airport.

14 14. On occasion, I have worked overtime hours at US Airways' request, for example,
15 due to a flight delay that extended my scheduled shift or due to a re-routed flight that arrived
16 outside of my scheduled shift. When I worked more than 8 hours a day or 40 hours in a week, all
17 at US Airways' request, I was paid at the rate of time and a half for all such hours worked.

18 15. I have not incurred any work-related expenses during my employment as a Fleet
19 Service Agent at US Airways.

20 16. I have never been forced or pressured in any way by US Airways to use my
21 personal cellular phone for work-related purposes while on the clock. There are no occasions
22 where I would need to use my personal cellular phone for work-related purposes while on the
23 clock. I have never used my personal cellular phone for work-related purposes while on the
24 clock.

1 bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8
2 hours per shift by US Airways. Often, I voluntarily shift trade or shift swap with other Fleet
3 Service Agents. This means that either another Agent works one of the shifts US Airways
4 scheduled me to work or that I work a shift that US Airways scheduled another agent to work. As
5 a result, I may have worked more or less hours in a week than I was originally scheduled to work
6 by US Airways.

7 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
8 agreement between US Airways and my union. I am aware that the collective bargaining
9 agreement contains provisions governing shift trades, including restrictions on how far in advance
10 shift trades must be submitted and that hours worked as a result of voluntary shift trades will be
11 paid at my regular rate of pay.

12 6. Managers are not involved in approving shift trades. Rather, shift trades are
13 effected through an electronic system called "Workbrain." Agents log-in to Workbrain using a
14 unique user name and password and either post shifts that they would like to drop or sign-up to
15 take shifts that others have indicated they wish to drop.

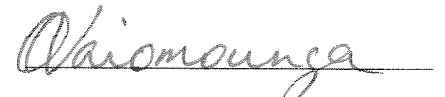
16 7. I understand that when I trade shifts with a fellow employee using the Workbrain
17 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
18 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
19 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
20 trade.

21 8. I have never been forced or pressured by US Airways in any way to work a shift
22 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
23 to work more or less shifts than originally scheduled.

24 9. I like being able to trade shifts with Fleet Service Agents. Trading shifts allows
25 me to take more frequent vacations to visit my family in Tonga because I am able to arrange my
26 schedule so that I have an extended number of days off for such visits. Shift-trades allow me

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.
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5 EXECUTED this 7 day of August at SAN JOSE.
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9 ONEHUNGA VAIOMOUNGA
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DECLARATION OF ONEHUNGA VAIOMOUNGA

USAIR0001167

EXHIBIT 68

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF PETER VENTURINI

I, Peter Venturini, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Francisco International Airport as a Fleet Service Agent, and have held that position with US Airways or one of its corporate predecessors since 1978.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8 hours per shift by US Airways. Occasionally, I voluntarily shift trade or shift swap with other

DECLARATION OF PETER VENTURINI

1 Fleet Service Agents. This means that either another Agent works one of the shifts US Airways
2 scheduled me to work or that I work a shift that US Airways scheduled another agent to work. As
3 a result, I may have worked more or less hours in a week than I was originally scheduled to work
4 by US Airways.

5 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
6 agreement between US Airways and my union. I am aware that the collective bargaining
7 agreement contains provisions governing shift trades, including restrictions on how far in advance
8 shift trades must be submitted and that hours worked as a result of voluntary shift trades will be
9 paid at my regular rate of pay.

10 6. Shift trades are effected through an electronic system called "Workbrain." Agents
11 log-in to Workbrain using a unique user name and password and either post shifts that they would
12 like to drop or sign-up to take shifts that others have indicated they wish to drop. Workbrain
13 automatically approves or denies shift trade requests according to pre-determined rules, without
14 management review.

15 7. I understand that when I trade shifts with a fellow employee using the Workbrain
16 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
17 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
18 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
19 trade.

20 8. I have never been forced or pressured by US Airways in any way to work a shift
21 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
22 to work more or less shifts than originally scheduled.

23 9. I like being able to trade shifts with Fleet Service Agents. Trading shifts allows
24 me to work fewer hours according my personal schedule and to reduce my overall workload..
25 Shift-trades allow me greater flexibility to make my own schedule, but, overall, I do not work
26 substantially more hours because of shift-trades. If US Airways stopped allowing employees to
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1 trade shifts, I would have far less flexibility in my schedule and would be unable to reduce my
2 workload, which is increasingly important to me after thirty five (35) years of service. I do not
3 support a lawsuit that challenges the shift-trade policy.

4 10. Throughout my employment with US Airways, I have been provided a wage
5 statement on a biweekly basis.

6 11. On each wage statement, I understand the way my pay is calculated. I believe that
7 the information on my wage statements is an accurate reflection of the number of hours I worked.
8 I have not noticed any discrepancies or errors on my wage statements.

9 12. If I noticed any errors on my wage statement, I would discuss these with Nathalie
10 Obregon, the Workbrain Timekeeper at San Francisco International Airport or Sherry Hoy, the
11 Station Coordinator at San Francisco International Airport.

12 13. On occasion, I have worked overtime hours at US Airways' request, for example,
13 due to a flight delay that extended my scheduled shift or to provide coverage when other Fleet
14 Service Agents are sick or on vacation. When I worked more than 8 hours a day or 40 hours in a
15 week, all at US Airways' request, I was paid at the rate of time and a half for all such hours
16 worked.

17 14. I have never incurred any work-related expenses during my employment as a Fleet
18 Service Agent at US Airways, though I am aware that I am able to submit an expense report if I
19 were to incur work-related expenses.

20 15. US Airways has strictly prohibited Fleet Service Agents from using their personal
21 cellphones while "on the ramp."

22 16. I have never been forced or pressured in any way to use my personal cellular
23 phone for work-related purposes while on the clock. There are no occasions where I would need
24 to use my personal cellular phone for work-related purposes while on the clock.

25 17. It is difficult to exceed the minutes allowed by my personal cellular phone plan,
26 and I cannot recall an occasion when I have exceeded the minutes allowed under my plan.

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DECLARATION OF PETER VENTURINI

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2 I declare under penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct.
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6 EXECUTED this 3RD day of September at SAN MATEO, COUNTY

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10 PETER VENTURNI
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EXHIBIT 69

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF DONNELL WOOLFOLK

I, Donnell Woolfolk, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at Los Angeles International Airport as a Fleet Service Agent, and have held that position with US Airways or one of its corporate predecessors since 2005.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning luggage carts around the ramp, and driving tugs towing baggage carts. I work part-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to this process I am typically scheduled to work five (5) days per week and four (4) hours per shift by US Airways. Weekly, I voluntarily shift trade or shift swap with other Fleet

DECLARATION OF DONNELL WOOLFOLK

1 Service Agents. This means that either another Agent works one of the shifts US Airways
2 scheduled me to work or that I work a shift that US Airways scheduled another agent to work. As
3 a result, I may have worked more or less hours in a week than I was originally scheduled to work
4 by US Airways.

5 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
6 agreement between US Airways and my union. I am aware that the collective bargaining
7 agreement contains provisions governing shift trades, including that hours worked as a result of
8 voluntary shift trades will be paid at my regular rate of pay.

9 6. Managers generally are not involved in approving shift trades. Rather, shift trades
10 are effected through an electronic system called "Workbrain." Agents log-in to Workbrain using
11 a unique user name and password and either post shifts that they would like to drop or sign-up to
12 take shifts that others have indicated they wish to drop. On extremely rare occasions,
13 management may approve a shift trade rejected by Workbrain.

14 7. I understand that when I trade shifts with a fellow employee using the Workbrain
15 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
16 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
17 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
18 trade.

19 8. I have never been forced or pressured by US Airways in any way to work a shift
20 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
21 to work more or less shifts than originally scheduled.

22 9. I love being able to trade shifts with Fleet Service Agents. Trading shifts allows
23 me to spend more time on personal matters, such as extending vacations, visiting my family out
24 of town, and attending to family emergencies. I also use shift-trades to pick-up additional shifts
25 to earn additional income and to accommodate my schedule at my second job outside of US
26 Airways. Shift-trades allow me greater flexibility to make my own schedule. If US Airways

1 stopped allowing employees to trade shifts, I would be very upset because I would have far less
2 flexibility in my schedule and this would make it much more difficult for me to work my second
3 job or visit my family. I do not support a lawsuit that challenges the shift-trade policy.

4 10. In my experience shift-trades are very popular among Fleet Service Agents. Many
5 agents use trades to balance other employment or to create a flexible schedule for other, personal
6 reasons, such as taking care of children, family emergencies, extending vacations or spending
7 more time with family. Change in the current shift-trade policy would be traumatic for Fleet
8 Service Agents as a group.

9 11. Throughout my employment with US Airways, I have been provided a wage
10 statement on a biweekly basis.

11 12. On each wage statement, I understand the way my pay is calculated. I believe that
12 the information on my wage statements is an accurate reflection of the number of hours I worked.
13 On a couple of occasions, I've noticed errors on my wage statement. When I do, I contact Paul
14 Colbert, the Workbrain Timekeeper at Los Angeles International Airport, who promptly corrects
15 the error and I am paid for all hours worked.

16 13. If I notice any errors on my wage statement in the future, I would again discuss
17 these with Paul Colbert.

18 14. On occasion, I have worked overtime hours at US Airways' request, for example,
19 due to a flight delay that extended my scheduled shift, increased air traffic as a result of the
20 holidays. When I worked more than 8 hours a day or 40 hours in a week, all at US Airways'
21 request, I was paid at the rate of time and a half for all such hours worked.

22 15. I have not incurred any work-related expenses during my employment as a Fleet
23 Service Agent at US Airways. And if I did, I would contact Paul Colbert to be reimbursed.

24 16. I have never been forced or pressured in any way by US Airways to use my
25 personal cellular phone for work-related purposes while on the clock. There are no occasions
26 where I would need to use my personal cellular phone for work-related purposes while on the
27

1 clock. I have never used my personal cellular phone for work-related purposes while on the
2 clock.

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4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.
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8 **EXECUTED** this 9 day of Sept at Los Angeles County.
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12 DONNELL WOOLFOLK
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EXHIBIT 70

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF JASON VISITACION

I, Jason Visitacion, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Jose International Airport as a Fleet Service Agent, and have held that position with US Airways or its corporate predecessors since 2003.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek, or more than 8 hours are worked in a workday, as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8 hours per shift by US Airways. Most weeks, I voluntarily shift trade or shift swap with other

DECLARATION OF JASON VISITACION

1 Fleet Service Agents. This means that either another Agent works one of the shifts US Airways
2 scheduled me to work or that I work a shift that US Airways scheduled another agent to work. As
3 a result, I may have worked more or less hours in a week than I was originally scheduled to work
4 by US Airways.

5 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
6 agreement between US Airways and my union. I am aware that the collective bargaining
7 agreement contains provisions governing shift trades, including that hours worked as a result of
8 voluntary shift trades will be paid at my regular rate of pay.

9 6. In my experience, managers are not involved in approving shift trades. Rather,
10 shift trades are effected through an electronic system called "Workbrain." Agents log-in to
11 Workbrain using a unique user name and password and either post shifts that they would like to
12 drop or sign-up to take shifts that others have indicated they wish to drop.

13 7. I understand that when I trade shifts with a fellow employee using the Workbrain
14 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
15 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
16 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
17 trade.

18 8. I have never been forced or pressured by US Airways in any way to work a shift
19 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
20 to work more or less shifts than originally scheduled.

21 9. I like being able to trade shifts with Fleet Service Agents. Trading shifts allows
22 me to drop some of my regularly scheduled shifts in order to travel by using the flight privileges
23 afforded to me by US Airways. I have family in Hawaii and Chicago and am able to visit them
24 more often and for longer periods of time than I otherwise would because of shift-trades. In
25 addition, I am regularly scheduled to work on weekends and will typically drop at least one of my
26 scheduled weekend shifts in order to spend time with my wife, who gets weekends off and works
27

1 during the week. Shift-trades allow me greater flexibility to make my own schedule, but, overall,
2 I do not work substantially more hours because of shift-trades. If US Airways stopped allowing
3 employees to trade shifts, I would be very disappointed. I would have far less flexibility in my
4 schedule and this would make it much more difficult for me to spend time with my wife and with
5 my extended family, who live out of state. It would make this job far less desirable because I
6 greatly enjoy the flexibility and the ability to travel. I do not support a lawsuit that challenges the
7 shift-trade policy.

8 10. In my experience shift-trades are very popular among Fleet Service Agents. Many
9 agents use trades to balance other employment or, like me, to drop shifts to take extended and
10 more frequent vacations and to spend more time with family.

11 11. Throughout my employment with US Airways, I have been provided a wage
12 statement on a biweekly basis.

13 12. On each wage statement, I understand the way my pay is calculated. I believe that
14 the information on my wage statements is an accurate reflection of the number of hours I worked.
15 I have not noticed any discrepancies or errors on my wage statements and believe that I have been
16 accurately paid for all time worked.

17 13. If I noticed any errors on my wage statement or had any questions about my pay in
18 the future, I would discuss these with Tammy Andersen, the Workbrain Timekeeper at San Jose
19 International Airport.

20 14. On occasion, I have worked overtime hours at US Airways' request, for example,
21 due to a flight delay that extended my scheduled shift. When I worked more than 8 hours a day
22 or 40 hours in a week, all at US Airways' request, I was paid at the rate of time and a half for all
23 such hours worked.

24 15. I have not incurred any work-related expenses during my employment as a Fleet
25 Service Agent at US Airways. If I did, I would discuss being reimbursed for these expenses with
26 Tammy Andersen.

1 16. I have never been forced or pressured in any way by US Airways to use my
2 personal cellular phone for work-related purposes while on the clock and in fact, US Airways
3 strictly prohibits cell phone use on the ramp. There are no occasions where I would need to use
4 my personal cellular phone for work-related purposes while on the clock. I have never used my
5 personal cellular phone for work-related purposes while on the clock.

6
7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9
10
11 **EXECUTED** this 12 day of SEPTEMBER 2013 at Santa Clara County.

12
13
14 
15 JASON VISITACION

EXHIBIT 71

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF DAVID YOUNG

I, David Young, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Diego International Airport as a Fleet Service Agent, and have held that position with US Airways or one of its corporate predecessors since 1983. For some of this time, I worked at Charlotte Douglas International Airport in Charlotte, North Carolina.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek or eight hours in a day as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8

DECLARATION OF DAVID YOUNG

1 hours per shift by US Airways. Frequently, at least once a week, I voluntarily shift trade or shift
2 swap with other Fleet Service Agents. This means that either another Agent works one of the
3 shifts US Airways scheduled me to work or that I work a shift that US Airways scheduled another
4 agent to work. As a result, I may have worked more or less hours in a week than I was originally
5 scheduled to work by US Airways.

6 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
7 agreement between US Airways and my union. I am aware that the collective bargaining
8 agreement contains provisions governing shift trades, including restrictions on how far in advance
9 shift trades must be submitted, the maximum number of shifts that can be dropped in a quarter,
10 and that hours worked as a result of voluntary shift trades will be paid at my regular rate of pay.

11 6. In my experience, managers are generally not involved in approving shift trades.
12 Rather, shift trades are effected through an electronic system called "Workbrain." Agents log-in
13 to Workbrain using a unique user name and password and either post shifts that they would like to
14 drop or sign-up to take shifts that others have indicated they wish to drop. The only time that I
15 am aware of managers being involved in approving shift trades is when Fleet Service Agents wish
16 to shift-trade after the cut-off period established by the collective bargaining agreement. In such
17 instances, though Workbrain will not permit the proposed trade, a manager may over-ride the
18 system to allow the trade.

19 7. I understand that when I trade shifts with a fellow employee using the Workbrain
20 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
21 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
22 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
23 trade.

24 8. I have never been forced or pressured by US Airways in any way to work a shift
25 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
26 to work more or less shifts than originally scheduled.

1 9. Being able to trade shifts with Fleet Service Agents is one of the best perks of my
2 job as a Fleet Service Agent because it allows me far more flexibility to make my own schedule.
3 For example, my regular days off are Sunday and Monday, and, every week, I drop my regularly
4 scheduled Saturday shift so that I can have a three-day weekend. I also use shift-trades to take
5 advantage of the travel privileges that are afforded to me by US Airways, by dropping some of
6 my regularly scheduled shifts so that I can travel for extended periods of time. Overall, I do not
7 work substantially more hours because of shift-trades. I would be very upset if US Airways
8 stopped allowing employees to trade shifts, as I would have far less flexibility in my schedule. I
9 do not support a lawsuit that challenges the shift-trade policy.

10 10. In my experience shift-trades are very popular among Fleet Service Agents. Many
11 agents use trades, like me, to create a flexible schedule for personal reasons, such as taking
12 extended vacations or spending more time with family. Many part-time Fleet Service Agents use
13 shift-trades to earn additional income by picking up extra shifts, which makes their job more
14 financially viable. For this reason and others, I believe that the majority of Fleet Service Agents
15 would be upset if US Airways stopped allowing employees to trade shifts.

16 11. Throughout my employment with US Airways, I have been provided a wage
17 statement on a biweekly basis, which I review regularly.

18 12. On each wage statement, I understand the way my pay is calculated. In addition to
19 regularly reviewing my wage statement, I regularly review my hours worked as recorded on
20 Workbrain. I believe that the information on my wage statements and on Workbrain is an
21 accurate reflection of the number of hours I have worked. I have not noticed any discrepancies or
22 errors on my wage statements. As a result, I believe I have been paid accurately for all hours
23 worked.

24 13. If I noticed any errors on my wage statement in the future, I would discuss these
25 with Kyle Benton, my shift supervisor at San Diego International Airport.
26
27
28

USAIR0001183

EXHIBIT 72

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF JEFFREY YOUNG

I, Jeffrey Young, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at San Diego International Airport as a Fleet Service Agent, and have held that position with US Airways or one of its corporate predecessors since 1988. For some of this time, I worked at the Los Angeles International Airport, in Los Angeles and the Charlotte Douglas International Airport in Charlotte, North Carolina.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an hourly basis. I currently work full-time and am paid on an

DECLARATION OF JEFFREY YOUNG

1 hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to this
2 process I am typically scheduled to work 5 days per week and 8 hours per shift by US Airways.
3 Just about every week, I voluntarily shift trade or shift swap with other Fleet Service Agents.
4 This means that either another Agent works one of the shifts US Airways scheduled me to work
5 or that I work a shift that US Airways scheduled another agent to work. As a result, I may have
6 worked more or less hours in a week than I was originally scheduled to work by US Airways.

7 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
8 agreement between US Airways and my union. I am aware that the collective bargaining
9 agreement contains provisions governing shift trades, including restrictions on how far in advance
10 shift trades must be submitted, the number of shifts that may be dropped per quarter and that
11 hours worked as a result of voluntary shift trades will be paid at my regular rate of pay.

12 6. In my experience, managers are generally not involved in approving shift trades.
13 Rather, shift trades are effected through an electronic system called "Workbrain." Agents log-in
14 to Workbrain using a unique user name and password and either post shifts that they would like to
15 drop or sign-up to take shifts that others have indicated they wish to drop. The only time that I
16 am aware of managers being involved in approving shift trades is when Fleet Service Agents wish
17 to shift-trade after the cut-off period established by the collective bargaining agreement. In such
18 instances, though Workbrain will not permit the proposed trade, a manager may over-ride the
19 system to allow the trade.

20 7. I understand that when I trade shifts with a fellow employee using the Workbrain
21 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
22 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
23 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
24 trade.

8. I have never been forced or pressured by US Airways in any way to work a shift under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process to work more or less shifts than originally scheduled.

9. I like being able to trade shifts with Fleet Service Agents. Trading shifts allows me greater flexibility to make my own schedule. I have held this job for twenty five (25) years and prefer not to work five days a week anymore. Accordingly, I typically drop one shift per week through the shift-trade program so that I have more time off. In addition, I use shift-trades to drop shifts in order to use the flight privileges provided to me by US Airways. Though I currently do not work substantially more hours because of shift-trades, I previously worked part-time and would use shift-trades to pick up hours to earn additional income as needed. If US Airways stopped allowing employees to trade shifts, I would be quite upset. I would have far less flexibility in my schedule and this would make the job less appealing to me. I do not support a lawsuit that challenges the shift-trade policy.

10. In my experience shift-trades are very popular among Fleet Service Agents. Many agents use trades to balance other employment or to create a flexible schedule for other, personal reasons, such as taking extended vacations or spending more time with family. I believe that Fleet Service Agents would be extremely upset if US Airways stopped allowing employees to trade shifts.

11. Throughout my employment with US Airways, I have been provided a wage statement on a biweekly basis. In the past, while working at the Charlotte Douglas International Airport, I have noticed errors on my wage statements. In those instances, I spoke with administration and they promptly corrected any mistakes. As a result, I believe that I have been accurately paid for all hours worked.

12. If I noticed any errors on my wage statement in the future, I would discuss these with Kyle Benton, my shift supervisor at San Diego International Airport.

14. I have not incurred any work-related expenses during my employment as a Fleet Service Agent at US Airways. If I did incur any work-related expenses in the future, I would speak with my shift supervisor, Kyle Benton, to be reimbursed.

14. I have not incurred any work-related expenses during my employment as a Fleet Service Agent at US Airways. If I did incur any work-related expenses in the future, I would speak with my shift supervisor, Kyle Benton, to be reimbursed.

15. US Airways strictly prohibits cell phone use on the ramp. It is difficult to exceed the minutes allowed by my personal cellular phone plan, and I cannot recall an occasion when I have exceeded the minutes allowed under my plan.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED this 06 day of September, 2013 at San Diego County.

Jeffrey Young
JEFFREY YOUNG

JEFFREY YOUNG

EXHIBIT 73

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF CRISTOBAL ZELAYA

I, Cristobal Zelaya, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at Ontario International Airport as a Lead Fleet Service Agent, and have held that position or the position of Fleet Service Agent with US Airways or one of its corporate predecessors since 1998. I previously worked at Los Angeles International Airport in Los Angeles, California.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Lead Fleet Service Agent, I am responsible for training and overseeing teams of Fleet Service Agents and for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning beverage and luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to

DECLARATION OF CRISTOBAL ZELAYA

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1 this process I am typically scheduled to work 5 days per week and 8 hours per shift by US
2 Airways. Frequently, I voluntarily shift trade or shift swap with other Fleet Service Agents. This
3 means that either another Agent works one of the shifts US Airways scheduled me to work or that
4 I work a shift that US Airways scheduled another agent to work. As a result, I may have worked
5 more or less hours in a week than I was originally scheduled to work by US Airways.

6 5. As a Lead Fleet Service Agent, my employment is governed by a collective
7 bargaining agreement between US Airways and my union. I am aware that the collective
8 bargaining agreement contains provisions governing shift trades, including restrictions on how far
9 in advance shift trades must be submitted and that hours worked as a result of voluntary shift
10 trades will be paid at my regular rate of pay.

11 6. Managers are generally not involved in approving shift trades. Rather, shift trades
12 are effected through an electronic system called "Workbrain." Agents log-in to Workbrain using
13 a unique user name and password and either post shifts that they would like to drop or sign-up to
14 take shifts that others have indicated they wish to drop. The only exception that I am aware of, is
15 where there is a problem with Workbrain and the manager needs to correct it.

16 7. I understand that when I trade shifts with a fellow employee using the Workbrain
17 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
18 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
19 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
20 trade.

21 8. I have never been forced or pressured by US Airways in any way to work a shift
22 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
23 to work more or less shifts than originally scheduled.

24 9. I like being able to trade shifts with Fleet Service Agents. Trading shifts allows
25 me to spend more time on personal pursuits, such as attending Raiders' games in Oakland,
26 California or taking advantage of my travel privileges afforded to me by US Airways to attend
27

1 out-of-state Dodgers' games. I also use shift-trades to spend time with my family on the
2 weekends. Shift-trades allow me greater flexibility to make my own schedule, but, overall, I do
3 not work substantially more hours because of shift-trades. If US Airways stopped allowing
4 employees to trade shifts, I would be devastated because I would have far less flexibility in my
5 schedule and this would make it much more difficult for me to attend weekend sporting events
6 and to maximize the time I spend with my family. I do not support a lawsuit that challenges the
7 shift-trade policy.

8 10. In my experience shift-trades are very popular among Fleet Service Agents. Many
9 agents use trades to balance other employment or to create a flexible schedule for other, personal
10 reasons, such as taking extended vacations or spending more time with family. Fleet Service
11 Agents also use the shift-trade policy to earn additional income that otherwise would not be
12 available by picking-up additional shifts.

13 11. Throughout my employment with US Airways, I have been provided a wage
14 statement on a biweekly basis.

15 12. On each wage statement, I understand the way my pay is calculated. I believe that
16 the information on my wage statements is an accurate reflection of the number of hours I worked.
17 I have not noticed any discrepancies or errors on my wage statements.

18 13. If I noticed any errors on my wage statement, I would discuss these with Sherrie
19 Cairns, the Station Manager at Ontario International Airport.

20 14. On occasion, I have worked overtime hours at US Airways' request, for example,
21 due to a Fleet Service Agents calling-in sick, being on jury duty, or being on medical leave.
22 When I worked more than 8 hours a day or 40 hours in a week, all at US Airways' request, I was
23 paid at the rate of time and a half for all such hours worked.

24 15. I have not incurred any work-related expenses during my employment as a Fleet
25 Service Agent at US Airways.

17. It is difficult to exceed the minutes allowed by my personal cellular phone plan, and I cannot recall an occasion when I have exceeded the minutes allowed under my plan.

17. It is difficult to exceed the minutes allowed by my personal cellular phone plan, and I cannot recall an occasion when I have exceeded the minutes allowed under my plan.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED this 17th day of September 2013 at San Bernardino County.

CRISTOBAL ZELAYA

EXHIBIT 74

KOHSWEENEY DECLARATION IN SUPPORT OF MOTION TO DENY CLASS CERTIFICATION

DECLARATION OF LUIS ZEPEDA

I, Luis Zepeda, declare and state as follows:

1. If called upon to testify, I could and would testify competently to the following facts that are within my personal knowledge.

2. I am currently employed by US Airways, Inc. ("US Airways") at Los Angeles International Airport as a Fleet Service Agent, and have held that position with US Airways or one of its corporate predecessors since 1998.

3. I understand that I am providing this statement in connection with a pending lawsuit that was filed by former Fleet Service Agents at US Airways. I understand that the agents who filed the lawsuit allege that US Airways Fleet Service Agents working in California should receive, among other things, back wages at the rate of one-and-one-half times the Fleet Service Agents' regular rate of pay when more than 40 hours are worked in a workweek as a result of voluntary "shift-trades" or "shift swaps," and expense reimbursements for usage of personal cellular phones for work-related purposes. It has been explained to me that if these individuals are allowed to represent other Fleet Service Agents, I may be allowed to participate in the lawsuit and may be awarded money if the case is successful. US Airways' lawyers have told me that they may use the facts I provide to defend US Airways in this litigation, and to defeat the claims described to me. Knowing all this, I indicated that I was willing to share my experiences and declare to their truth in this document.

4. As a Fleet Service Agent, I am responsible for moving baggage and cargo, driving and operating belt loaders, servicing aircraft at gates with power and air conditioning, towing and pushback of aircraft from gates, servicing aircraft lavatories and water ports, cleaning aircraft, positioning luggage carts around the ramp, and driving tugs towing baggage carts. I work full-time and am paid on an hourly basis. US Airways establishes a weekly schedule that I bid for, and pursuant to this process I am typically scheduled to work 5 days per week and 8 hours per shift by US Airways. At least once per week, I voluntarily shift swap with another Fleet Service

DECLARATION OF LUIS ZEPEDA

1 Agent. This means that the other Agent works one of the shifts US Airways scheduled me to
2 work and that I work a shift that US Airways scheduled the other agent to work. As a result, I
3 may have worked more or less hours in a week than I was originally scheduled to work by US
4 Airways.

5 5. As a Fleet Service Agent, my employment is governed by a collective bargaining
6 agreement between US Airways and my union. I am aware that the collective bargaining
7 agreement contains provisions governing shift trades, including restrictions on how far in advance
8 shift trades must be submitted, the maximum number of shifts that may be dropped per calendar
9 quarter, and that hours worked as a result of voluntary shift trades will be paid at my regular rate
10 of pay.

11 6. Managers are not involved in approving shift trades. Rather, shift trades are
12 effected through an electronic system called "Workbrain." Agents log-in to Workbrain using a
13 unique user name and password and either post shifts that they would like to drop or sign-up to
14 take shifts that others have indicated they wish to drop.

15 7. I understand that when I trade shifts with a fellow employee using the Workbrain
16 system that I voluntarily agree to either drop one of the shifts US Airways scheduled me to work,
17 or to pick-up a shift US Airways had scheduled another employee to work. On the occasions that
18 I have worked a shift-trade, I have been paid fully for the hours I worked pursuant to that shift
19 trade.

20 8. I have never been forced or pressured by US Airways in any way to work a shift
21 under the general shift-trades policies. It is entirely up to me whether I use the shift-trade process
22 to work more or less shifts than originally scheduled.

23 9. I like being able to trade shifts with Fleet Service Agents. Trading shifts allows
24 me to spend more time on personal pursuits, such as spending time with my family and taking
25 advantage of the flight privileges afforded to me by US Airways. I trade shifts weekly with one
26 particular agent in order to align my days off with those of my wife, so that we can spend time
27

1 together as a family. Shift-trades allow me greater flexibility to make my own schedule, but,
2 overall, I do not work substantially more hours because of shift-trades. If US Airways stopped
3 allowing employees to trade shifts, I would have far less flexibility in my schedule and this would
4 make it much more difficult for me to maximize the time I spend with my family. I do not
5 support a lawsuit that challenges the shift-trade policy.

6 10. In my experience shift-trades are very popular among Fleet Service Agents. Many
7 agents use trades to balance other employment or to create a flexible schedule for other, personal
8 reasons, such as taking extended vacations or spending more time with family or on personal
9 hobbies. I regularly trade shifts with one particular agent, who uses the time off to travel to visit
10 his family out of state.

11 11. Throughout my employment with US Airways, I have been provided a wage
12 statement on a biweekly basis.

13 12. On each wage statement, I understand the way my pay is calculated. I believe that
14 the information on my wage statements is an accurate reflection of the number of hours I worked.
15 I have not noticed any discrepancies or errors on my wage statements. On one occasion, I noticed
16 a discrepancy on my wage statement because I forgot to clock-out from my regularly scheduled
17 shift. I spoke with my shift manager about this and with Paul Colbert, the Workbrain Timekeeper
18 at Los Angeles International Airport.

19 13. If I noticed any errors on my wage statement in the future, I would again discuss
20 these with my shift manager and with Paul Colbert.

21 14. On occasion, I have worked overtime hours at US Airways' request, for example
22 when another Fleet Service Agent calls in sick or there are mechanical problems with aircraft.
23 When I worked more than 8 hours a day or 40 hours in a week, all at US Airways' request, I was
24 paid at the rate of time and a half for all such hours worked.

